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CLERK U.S. DISTRICT COURT DISTRICT OF ARIZONA	
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,
Plaintiff,

vs.

Lorenzo McCabe,
Defendant.

No. CR-22-08038-PCT-MTL (MTM)

**REDACTED
INDICTMENT**

VIO: 18 U.S.C. §§ 1153, 2243(a), 2246,
and 2247
CIR - Sexual Abuse of a Minor
Count 1

18 U.S.C. §§ 1153, 2244(a)(3), 2246
and 2247
CIR - Abusive Sexual Contact
Count 2

18 U.S.C. § 2260A
Commission of a Sex Offense by
Registered Sex Offender
Count 3

THE GRAND JURY CHARGES:

COUNT 1

On or about December 21, 2021, in the District of Arizona, within the confines of the Navajo Nation Indian Reservation, Indian Country, LORENZO McCABE, an Indian and repeat offender with a prior sex offense conviction, did knowingly engage in a sexual act with the victim, Jane Doe, a child who had attained the age of 12 but had not attained the age of 16 and who was at least 4 years younger than the defendant. The sexual act involved intentional touching, not through the clothing, of the victim's genitalia with the defendant's hand, with an intent to abuse, humiliate, harass and degrade the victim and

1 arouse and gratify the sexual desire of the defendant.

2 In violation of Title 18, United States Code, Sections 1153, 2243(a), 2246 and 2247.

3 **COUNT 2**

4 On or about December 21, 2021, in the District of Arizona, within the confines of
5 the Navajo Nation Indian Reservation, Indian Country, LORENZO McCABE, an Indian
6 and repeat offender with a prior sex offense conviction, did knowingly engage in a sexual
7 contact with the victim, Jane Doe, a child who had attained the age of 12 but had not
8 attained the age of 16 and who was at least 4 years younger than the defendant. The sexual
9 contact involved intentional touching, directly and through the clothing, of the victim's
10 genitalia and breasts with the defendant's hand, with an intent to abuse, humiliate, harass
11 and degrade the victim or arouse and gratify the sexual desire of the defendant.

12 In violation of Title 18, United States Code, Sections 1153, 2244(a)(3), 2246, and
13 2247.

14 **COUNT 3**

15 On or about December 21, 2021, in the District of Arizona, LORENZO McCABE,
16 an individual required by federal, state, and tribal law to register as a sex offender,
17 committed a felony offense involving a minor under 18 U.S.C. §§ 2243(a) and 2244(a)(3);
18 to wit, the offenses described in Counts 1 and 2 above.

19 In violation of Title 18, United States Code, Section 2260A.

20
21 A TRUE BILL

22 s/
23 FOREPERSON OF THE GRAND JURY
Date: April 26, 2022

24 GARY M. RESTAINO
25 United States Attorney
District of Arizona

26
27 s/
ALANNA R. KENNEDY
28 Assistant U.S. Attorney